PIA information

PIA
Streaming Service - ES

Author's name
Grupo 6

Assessor's name
Reviwer Name

Validator's name
Validater Name

Creation date
15/04/2019

DPO's name
DPO name

DPO's opinion
It seems the user information is safe whith the security measures taken.

Search of concerned people opinion
Concerned people opinion wasn't requested.

Reason why concerned people opinion wasn't requested
There are no concerned people.

Context

Overview

Which is the processing under consideration?

Collection and treatment of personal data of users.

What are the responsibilities linked to the processing?

Given that the information may be sensitive there are high risks involving the processing, we have to ensure the security of the data.

Are there standards applicable to the processing?

We will apply a anonymization process to ensure that the users are protected

Evaluation : Acceptable

Data, processes and supporting assets

What are the data processed?

All users will have there data processed. The storage duration will be as long as the users as is account, and the only a handfull of people will have access to their information.

How does the life cycle of data and processes work?

The processing starts as soon as the account is created, the information is stored in a centralized data-base and from there is processed to predict what the user may like. The data is erased when the user deletes is account.

What are the data supporting assets?

The assets will include a data-base and other aplications need to ensure security and the correct treatment of the data.

Evaluation : Acceptable

Fundamental principles

Proportionality and necessity

Are the processing purposes specified, explicit and legitimate?

Yes.

Evaluation : Acceptable

What are the legal basis making the processing lawful?

The information is provided to the user when he creates an account. Nothing will be processed without is consent.

Evaluation : Acceptable

Are the data collected adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')?

Yes. The collection is need for payment purposes and to provide a better experience to the user.

Evaluation : Acceptable

Are the data accurate and kept up to date?

The data is always collected based on user interaction, making it always accurate and up to date.

Evaluation : Acceptable

What are the storage duration of the data?

The data collection stops when the user deletes is account.

Evaluation : Acceptable

Controls to protect the personal rights of data subjects

How are the data subjects informed on the processing?

They are informed when they are creating the account.

Evaluation : Acceptable

If applicable, how is the consent of data subjects obtained?

The subject as to read the terms and conditions, and then they will comply or not to the data collection.

Evaluation : Acceptable

How can data subjects exercise their rights of access and to data portability?

They can ask to our client support service and everything will be provided

Evaluation : Acceptable

How can data subjects exercise their rights to rectification and erasure?

They can ask to our client support service and everything will be rectified or erased

> **Evaluation : Acceptable**

How can data subjects exercise their rights to restriction and to object?

They can ask to our client support service and their compliances will be ensured.

> **Evaluation : Acceptable**

Are the obligations of the processors clearly identified and governed by a contract?

Yes. In the terms and conditions all the processing procedure is explained.

> **Evaluation : Acceptable**

In the case of data transfer outside the European Union, are the data adequately protected?

There is no data transfer.

> **Evaluation : Acceptable**

Risks

Planned or existing measures

Anonyzation of the data

All personal information will be anonymized before being treated.

Evaluation : Acceptable

Encryped stored data

All stored data is encrypted.

Evaluation : Acceptable

Illegitimate access to data

What could be the main impacts on the data subjects if the risk were to occur?

Personal iformation of users (likes, credit card information, name, age)

What are the main threats that could lead to the risk?

Information Disclosure

What are the risk sources?

Staff and possible hackers.

Which of the identified controls contribute to addressing the risk?

Encryped stored data, Anonyzation of the data

How do you estimate the risk severity, especially according to potential impacts and planned controls?

Limited, Since all data is encrypted even if there is a breach there is no way to recover the data.

How do you estimate the likelihood of the risk, especially in respect of threats, sources of risk and planned controls?

Limited, All data the staff as access is anonymized, and with proper encryption we can consider the threat limited.

Evaluation : Acceptable

Unwanted modification of data

What could be the main impacts on the data subjects if the risk were to occur?

Disclosure of personal data.

What are the main threats that could lead to the risk?

Human error

What are the risk sources?

Staff and hackers

Which of the identified controls contribute to addressing the risk?

Anonyzation of the data, Encryped stored data

How do you estimate the risk severity, especially according to potential impacts and planned controls?

Limited, There is no information the staff as access that can make a difference if changed.

How do you estimate the likelihood of the risk, especially in respect of threats, sources of risk and planned controls?

Limited, The staff as only restricted permision to change information, they have majorly read permission.

Evaluation : Acceptable

Data disappearance

What could be the main impacts on the data subjects if the risk were to occur?

The deletion of their account.

What are the main threats that could lead to the risk?

Human error

What are the risk sources?

Staff and hackers

Which of the identified controls contribute to addressing the risk?

Anonyzation of the data, Encryped stored data

How do you estimate the risk severity, especially according to potential impacts and planned controls?

Limited, If a client as is account erased he can always have a proof of their payment and they will have their account back.

How do you estimate the likelihood of the risk, especially in respect of threats, sources of risk and planned controls?

Limited, The staff as limited permission to change the clients information.

Evaluation : Acceptable

Action plan

Overview

Fundamental principles

Purposes

Legal basis

Adequate data

Data accuracy

Storage duration

Information for the data
subjects

Obtaining consent

Information for the data
subjects

Right to rectification and
erasure

Right to restriction and to
object

Subcontracting

Transfers

Planned or existing measures

Anonyzation of the data

Encryped stored data

Risks

Illegitimate access to data

Unwanted modification of data

Data disappearance

Improvable Measures
Acceptable Measures

Fundamental principles

No action plan recorded.

Existing or planned measures
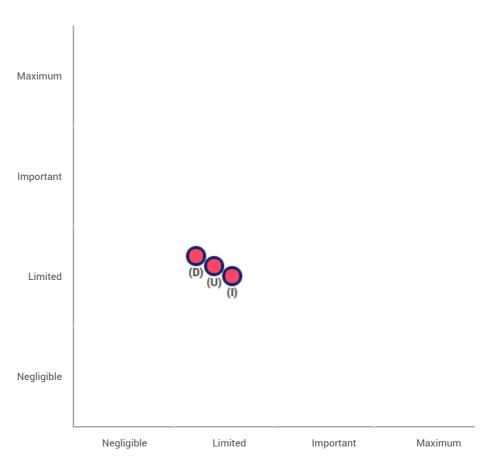
No action plan recorded.

Risks

No action plan recorded.

Risks overview

Potential impacts

Personal iformation of user...

Disclosure of personal data.

The deletion of their accou...

Threats

Information Disclosure

Human error

Sources

Staff and possible hackers.

Staff and hackers

Measures

Encryped stored data

Anonyzation of the data

Illegitimate access to data

Severity : Limited

Likelihood : Limited

Unwanted modification of data

Severity : Limited

Likelihood : Limited

Data disappearance

Severity : Limited

Likelihood : Limited

Risk mapping

Risk seriousness

| | Negligible | Limited | Important | Maximum |

Maximum

Important

Limited   (D) (U) (I)

Negligible

Negligible   Limited   Important   Maximum

Risk likelihood

- Planned or existing measures
- With the corrective measures implemented
- (I)llegitimate access to data
- (U)nwanted modification of data
- (D)ata disappearance

15/04/2019